

# MEMO ENDORSED

## TROY LAW, PLLC

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August 24, 2021

**Via ECF**

Honorable Edgardo Ramos  
United States District Court  
Southern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: **Joint Request for Three Week Extension to Submit Joint Fairness Letter  
with Executed Settlement Agreement**  
**ORTIZ OCHOA et al. v PRINCE DELI GROCERY CORP.**  
**d/b/a Prince Deli Grocery et al., 18-cv-09417**

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Dear Judge Ramos:

This office represents Plaintiff in the above-referenced matter. Plaintiff writes jointly with Defendants to request for a three (3) week extension from August 24, 2021 to September 14, 2021 to submit the executed Joint Fairness with Settlement Agreement for Your Honor's judicial approval.

The reason for the delay is that following the Settlement Conference held before Magistrate Judge Gorenstein on July 30, 2021, the Parties are working towards finalizing the Settlement Agreement. The Parties met and conferred about their remaining dispute over settlement terms, namely the provision of right of first refusal and provision concerning acceleration of settlement sum and payment of such sum in the event of the sale of the entire business Prince Deli, Defendants' only asset. The Parties will attempt to work out their differences, or request for a telephone conference before your Honor to finalize the Settlement Agreement in due fashion.

The parties thank the Court's kind consideration on this matter.

Granted. The deadline to submit the fairness letter and proposed settlement agreement is hereby extended to September 14, 2021. The Clerk of Court is respectfully directed to terminate the motion. Doc. 76.

So ordered.



Edgardo Ramos, U.S.D.J  
Dated: 8/25/2021  
New York, New York

Respectfully Submitted,

**TROY LAW PLLC**  
Attorneys for Plaintiff  
/s/ Tiffany Troy  
Tiffany Troy, Esq.